

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

ENTROPIC COMMUNICATIONS, LLC,  
  
Plaintiff,  
  
v.  
  
CHARTER COMMUNICATIONS, INC.,  
  
Defendant.

Case No. 2:23-cv-00050-JRG

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule CV-5(a)(7), Plaintiff Entropic Communications, Inc. (“Plaintiff”) hereby respectfully moves the Court for leave to file under seal Plaintiff’s Surreply in Further Opposition to Defendant’s Motion to Dismiss the Second Amended Complaint for Improper Venue pursuant to Federal Rule of Civil Procedure 12(b)(3) (the “Motion”). The Motion discusses confidential proprietary and business information, including information that the parties have previously agreed to file under seal in *Entropic Communications, LLC v. Charter Communications, Inc.*, No. 22-cv-0125(JRG) (E.D. Tex.), pursuant to a Protective Order. *See* No. 22-cv-0125(JRG) (E.D. Tex.), Dkt. 36 (Protective Order) and Dkt. 61 (Sealed Motion to Dismiss).

Counsel for Plaintiff has conferred with Counsel for Defendant Charter Communications, Inc. and this motion is unopposed.

WHEREFORE, Plaintiff respectfully requests that the Court grant its motion.

Dated: May 19, 2023

Respectfully submitted,

/s/ James Shimota by permission Andrea L. Fair

James Shimota (*pro hac vice* forthcoming)

George Summerfield (*pro hac vice* forthcoming)

**K&L GATES LLP**

70 W. Madison Street, Suite 3300

Chicago, IL 60602

Tel.: (312) 372-1121

Fax: (312) 827-8000

jim.shimota@klgates.com

george.summerfield@klgates.com

Darlene F. Ghavimi

Texas Bar No. 24072114

**K&L GATES LLP**

2801 Via Fortuna, Suite #650

Austin, TX 78746

Telephone: (512) 482-6919

Facsimile: (512) 482-6800

darlene.ghavimi@klgates.com

Peter E. Soskin (*pro hac vice* forthcoming)

**K&L GATES LLP**

Four Embarcadero Center, Suite 1200

San Francisco, CA 94111

Telephone: (415) 882-8200

Facsimile: (415) 882-8220

peter.soskin@klgates.com

Wesley Hill

Texas Bar No. 24032294

Andrea Fair

Texas Bar No. 24078488

**WARD, SMITH & HILL, PLLC**

1507 Bill Owens Pkwy

Longview, TX 75604

Tel: (903) 757-6400

wh@wsfirm.com

andrea@wsfirm.com

**ATTORNEYS FOR PLAINTIFF**

**ENTROPIC COMMUNICATIONS, LLC**

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel for Plaintiff has complied with the meet and confer requirement in Local Rule CV-7(h). Counsel for Defendant Charter Communications, Inc. indicated that it does not oppose the relief sought in this motion.

/s/ Andrea L. Fair  
Andrea L. Fair

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2023, I caused to be served a copy of the foregoing motion on all counsel of record via the Court's CM/ECF system.

/s/ Andrea L. Fair  
Andrea L. Fair